

**From:** [Laurie Stewart](#)  
**To:** [Regulatory Comments](#)  
**Subject:** 12 CFR Part 704; Federal Register 6004  
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Ms. Rupp and Members of the board

I urge you to consider the following issues:

Corporate Credit Unions should hold capital sufficient to prevent losses from flowing to Natural Person Credit Unions. Restructuring the capital standards applied to corporate credit union can mitigate the interdependency of risk recently demonstrated by the conservatorship of U.S. Central and WesCorp.

Corporate credit unions, such as WesCorp, that assume more risk require enhanced supervision. These credit unions are not the sole source of products and services to natural person credit unions. Credit Unions now participate as members of the Federal Home Loan Banks and the Federal Reserve Banks and no longer rely on corporates as a sole source of services and liquidity. As a result corporate credit unions have taken on large fields of membership and are operating on very thin margins.

NCUA should ensure that grater transparency is available with regard to the balance sheets of corporate credit unions. Corporate Credit Unions seem to be shopping ratings rather than increasing their disclosures.

Good corporate governance is part of sound risk management and the current system does not seem to encourage good governance.

Thank you for the opportunity to comment.

Sincerely,

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